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Naval Facilities Engineering Command

**ENGINEERING SERVICE CENTER**  
Port Hueneme, California 93043-4370

**USER GUIDE**  
**UG-2063-ENV**

**CALENDAR YEAR 2004 HAZARDOUS WASTE POLLUTION  
PREVENTION ANNUAL DATA SUMMARY (HW P2ADS)  
GUIDE**

by

Environmental Information Systems Branch

January 2005

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15. SUBJECT TERMS Hazardous waste, Measures of Merit (MOM), recycling, disposal, and transferred offsite.					
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a. REPORT	b. ABSTRACT	c. THIS PAGE			Estella Rosario
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## EXECUTIVE SUMMARY

The purpose of this guide is to help you prepare your Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS) for Calendar Year 2004. Because reporting requirements change from year to year, it is important to read this guide thoroughly. New this year, naval installations must provide their EPA identification number. In addition, installations may only report waste by EPA and Navy Source Codes.

HW P2ADS tracks the Department of the Navy's progress in meeting the Department of Defense (DOD) Measures of Merit (MOM) hazardous waste goals. The hazardous waste goal calls for a 50% reduction of hazardous waste transferred off site by 1999. The Naval Facilities Engineering Service Center (NFESC) collects HW P2ADS data from installations worldwide, as required by OPNAVINST 5090.1B and MCO P5090.2A, and reports the final information to the Chief of Naval Operations, Navy claimants, and Commandant of the Marine Corps. The data are then presented in a brief to the Deputy Under Secretary of Defense for Environment during the annual Environment, Safety and Occupational Health Management Review, and are further used in the *Defense Environmental Quality Annual Report to Congress*.

A new DOD HW metric, issued by ODUSD memo of 12 October 2004, subj: Revised Pollution Prevention and Compliance Metrics, will be in effect for Calendar Year 2005; however, until the new hazardous waste MOM goals are in effect we will continue to collect data based on the previous goals and reporting categories. The new DOD HW metric for CY05 calls for efficient management of hazardous waste to minimize lifecycle costs, continued reduction in hazardous wastes treated on site, and continued reduction in hazardous wastes shipped off site. Installations are encouraged to begin tracking their hazardous waste data according to the new and revised CY05 metric subcategories beginning January 2005, in anticipation of the CY05 HW P2ADS report. The new and revised subcategories are described in Section 1.7, Report Changes for CY05. Please note, under the new CY05 metric Government-owned, Contractor-operated (GOCO) installations that manifest hazardous waste off site for disposal, or that treat hazardous waste on site, must also report.

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# 1. INTRODUCTION

**1.1 PURPOSE AND SCOPE.** OPNAVINST 5090.1B and MCO P5090.2A require Navy and Marine Corps shore activities, worldwide, to report hazardous waste data. This guide contains reporting instructions to assist you in preparing your Calendar Year 2004 Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS). HW P2ADS tracks the Navy's progress in meeting the Department of Defense Hazardous Waste Measures of Merit (MOM) goal. The MOM goal calls for a 50% reduction in hazardous waste manifested off site by 1999, using 1992 as the baseline. Until the new CY05 hazardous waste MOM goals are in effect we will continue to collect data based on this goal.

The Naval Facilities Engineering Service Center (NFESC) collects HW data by installation and provides it for review to Marine Corps and Navy resource sponsors. A final report is provided to the Chief of Naval Operations and Commandant of the Marine Corps. The data are then presented in a brief to the Deputy Under Secretary of Defense for Environment during the annual Environment, Safety and Occupational Health Management Review, and are further used in the *Defense Environmental Quality Annual Report to Congress*.

**1.2 WHEN IS IT DUE?** The Calendar Year 2004 HW P2ADS, covering the period 1 January – 31 December 2004, must be **received at NFESC no later than 16 March 2005**. Marine Corps installations are also required to provide a copy to Commandant of the Marine Corps (LF).

**1.3 WHO MUST REPORT?** Installations that generate an average of 220 pounds or more of hazardous waste per month (2,640 pounds per year), or 2.2 pounds or more of acute hazardous waste per month, are required to complete the hazardous waste report form provided at the end of this guide. Host activities are expected to report for their tenants. Installations that are conditionally exempt small quantity generators--those that generate less than 220 pounds a month and whose information is not submitted by a host installation--are not required to report. Please refer to Section 2.1.1 for specific instructions.

Installations located in areas that have regionalized or consolidated functions must submit a report for their installation. The regional hazardous waste manager may collect and submit all the reports for the region, but **we must have an individual report for each installation**.

The HW P2ADS reporting requirements apply to naval activities on Air Force and Army installations, as well. Naval activities on Air Force or Army installations shall submit a report to NFESC for inclusion in the Navy totals.

**1.4 REPORTING CHANGES FOR CY04.** This calendar year naval installations must report all waste using EPA Source Codes, and the Navy S01-Ship Operations and M01-Munitions and Explosives Source Codes. Refer to Section 2.5 for a complete list of source codes. New this year, installations must report their EPA Identification Number--refer to Section 2.2.1, item #9.

Please be advised that a new DOD HW metric has been finalized and will be in effect for Calendar Year 2005. Based on the new metric, next year's CY05 HW P2ADS data call will be revised to

include the subcategories described in Section 1.7, Report Changes for CY05. Installations are encouraged to begin tracking HW information according to the new subcategories starting January 2005.

**1.5 WHERE DO I REPORT?** The CY04 HW P2ADS report may be submitted using either of the two reporting options listed below. We prefer that you submit your report via e-mail as an electronic report created using the P2ADS software described in Option (1).

OPTION (1) –P2ADS SOFTWARE REPORT. E-mail an electronic copy created using the P2ADS software. The software is available in Access 97 or Access 2000 and requires Windows 95, NT, 98, or 2000 to operate. You may download the software, manual, and reporting guidance from our environmental web page at: <http://enviro.nfesc.navy.mil/ps/datamanagement/main.htm#Download>.

**Submit your report** via e-mail to Estella Rosario at [estella.rosario@navy.mil](mailto:estella.rosario@navy.mil).

OPTION (2) –PAPER REPORT. Mail or fax a paper copy. Marine Corps installations must also provide a copy of the HW P2ADS report to CMC (LF), as required by MCO P5090.2A. Mail your printed HW P2ADS report to:

COMMANDING OFFICER  
NAVAL FACILITIES ENGINEERING SERVICE CENTER  
ATTN: ESC 424/ESTELLA ROSARIO  
1100 23RD AVENUE  
PORT HUENEME CA 93043-4370

As an alternative to mailing a paper report you may FAX your report to:

ESC424/Estella Rosario at DSN 551-4832 or (805) 982-4832.

FAXED reports will be accepted as the official report. You are not required to also send us a printed copy in addition to the faxed report; however, please verify that your fax was received by calling Estella Rosario at (805) 982-4807 or DSN 551-4807.

**1.6 WHERE TO GET HELP.** Contact one of our P2ADS experts listed below:

Estella Rosario, DSN 551-4807, (805) 982-4807, [estella.rosario@navy.mil](mailto:estella.rosario@navy.mil)  
Michael Nace, DSN 551-3550, (805) 982-3550, [michael.nace@navy.mil](mailto:michael.nace@navy.mil)

**1.7 REPORTING CHANGES FOR CY05--Advance Notice.** This section serves only as advance notice for next year's HW P2ADS reporting changes, based on the new DOD HW metric issued per ODUSD memo of 12 October 2004. Installations are not required to report using the new subcategories until the CY05 datacall. However, installations are encouraged to begin tracking HW information according to the new and revised subcategories starting January 2005.

The CY05 HW P2ADS datacall will be revised to include the following subcategories:

**Activities that must Report in CY05.** In addition to installations located in the United States, its territories and possessions, and overseas permanent base force structure facilities, Government-owned Contractor-operated (GOCO) installations that manifest hazardous waste off site for disposal, or that treat hazardous waste on site, must also report.

### **What to Report Beginning CY05.**

Installations located in the U.S., its territories and possessions, and GOCO facilities must report the following subcategories of HW shipped offsite:

- 1) Remediation waste--new HW P2ADS subcategory for CY05, use EPA Source Codes G41–49 for CY05; not reportable in CY04.
- 2) Chem demil waste--new HW P2ADS subcategory for CY05, use Navy Source Code M02 for CY05; reportable under Navy Source Code M01–Munitions and Explosives in CY04.
- 3) Polychlorinated Biphenyl (PCB) wastes--new HW P2ADS subcategory for CY05, use Navy Source Code PW1; reportable in CY04 only if regulated as HW by your state.
- (4) Conventional munitions sent off site for demilitarization--new HW P2ADS subcategory for CY05, use Navy Source Code M03; reportable under Navy Source Code M01–Munitions and Explosives in CY04.
- 5) Universal wastes--new HW P2ADS reporting subcategory for CY05, use Navy Source Code U01; not reportable in CY04.
- (6) HW shipped off site but NOT included in one of the subcategories above--reportable by EPA and Navy Source code.

Installations located in the U.S., its territories and possessions, and GOCO facilities must report the following subcategories of HW treated on site:

- (1) HW from any part of the lifecycle of munitions (conventional and chemical) treated on site in a RCRA permitted or interim status unit--new HW P2ADS subcategory for CY05, use Navy Source Code M04; reportable under Navy Source Code M01–Munitions and Explosives as treated on site in CY04.
- (2) HW treated on site but NOT included in Munitions subcategory above--reportable by EPA and Navy Source Code as treated on site.

Overseas installations must report the following subcategories of HW shipped off site:

- (1) Polychlorinated Biphenyl (PCB) wastes--new HW P2ADS subcategory for CY05, use Navy source Code PW1; reportable in CY04 only if regulated as HW in Final Governing Standards.
- (2) Remediation wastes--new HW P2ADS subcategory for CY05, use EPA Source Code G49; not reportable in CY04.
- (3) HW shipped off site but NOT included in one of the subcategories above--reportable by EPA and Navy Source Code.

**Table 1.1 New and Revised DOD Metric Subcategories for CY05.**

<b>HW shipped off site</b>		
<b>HW Subcategory</b>	<b>CY05</b>	<b>CY04</b>
Remediation waste	New HW P2ADS subcategory for CY05, use EPA Source Codes, G41-49	Not reportable
Chem demil waste	New HW P2ADS subcategory for CY05, use Navy Source Code M02	Reportable under Navy Source Code M01
Polychlorinated Biphenyl (PCB) wastes	New HW P2ADS subcategory for CY05, use Navy Source Code PW1	Reportable in CY04 only if regulated as HW by your State
Conventional munitions sent off site for demilitarization	New HW P2ADS subcategory for CY05, use Navy Source Code M03	Reportable under Navy Source Code M01
Universal wastes	New HW P2ADS reporting subcategory for CY05	Not reportable
HW shipped off site but <u>NOT</u> included in one of the subcategories above	Reportable by EPA and Navy Source code	Reportable by EPA and Navy Source code
<b>HW Treated On site</b>		
<b>HW Subcategory</b>	<b>CY05</b>	<b>CY04</b>
HW from any part of the lifecycle of munitions (conventional and chemical) treated on site	New HW P2ADS subcategory for CY05, Navy Source Code M04	Reportable under Navy Source Code M01
HW treated on site but <u>NOT</u> included in Munitions subcategory above	Reportable by EPA and Navy Source Code as treated on site	Reportable by EPA and Navy Source Code as treated on site
<b>Overseas HW Shipped Off site</b>		
<b>HW Subcategory</b>	<b>CY05</b>	<b>CY04</b>
Polychlorinated Biphenyl (PCB) wastes	New HW P2ADS subcategory for CY05, use Navy Source Code PW1	Reportable if regulated as HW in Final Governing Standards
Remediation wastes	New HW P2ADS subcategory for CY05, use EPA Source Code G49	Not reportable
HW shipped off site but <u>NOT</u> included in one of the subcategories above	Reportable by EPA and Navy Source Code	Reportable by EPA and Navy Source Code



## 2. COMPLETING THE HW P2ADS REPORT FORM

**2.1 GENERAL INSTRUCTIONS.** Requirements for this report differ from reports for the Environmental Protection Agency (EPA) and state agencies. The intent of this report is to gather data specific to Navy and Marine Corps hazardous waste operations, by installation. This report excludes non-Navy or non-Marine Corps operations and non-Navy or non-Marine Corps tenants. The installation must collect and submit reports for all of their Navy and Marine Corps tenants, and forward them to NFESC.

Installations located in areas that have regionalized or consolidated functions must submit a report for their installation. The regional hazardous waste manager may collect all the reports for the region, but **we must receive an individual report for each installation.** The following requirements apply to all Navy and Marine Corps installations, including naval activities on Air Force and Army installations.

### 2.1.1 Installations that must Report. (For Generator Class definitions see Section 2.1.3)

(1) All Class I and II generators located in the U.S., its territories and possessions, and overseas must report. Installation reports should include all Navy and Marine Corps tenants who generate hazardous waste. Tenants who are Class I and II generators must report to their host installation--regardless of who their claimant is. Note that the claimant is normally the resource sponsor. For example, a naval aviation depot that is a tenant of a naval station will send their report to the naval station--even though the claimant for the naval aviation depot is the Naval Air Systems Command. The naval station will forward the tenant report and their own report to NFESC. The installation is not required to merge the reports. Installations should not include waste generated by non-Navy or non-Marine Corps tenants, for example: Defense Reutilization and Marketing Office (DRMO), Army detachments, Coast Guard, Air Force, etc.

For hazardous waste offloaded from ships, the receiving shore activity shall include in their report all hazardous waste materials transferred from a Navy ship, as specified in OPNAVINST 5090.1B, Section 12-5.2.1, under Navy Source Code S01-Ship Operations.

(2) Class III generators that are tenants must provide their hazardous waste information to their host installation for inclusion in the host's report. Class III generators that are not tenants are not required to report.

(3) All Government-owned, Contractor-operated (GOCO) facilities performing work for the Department of the Navy who use a Navy EPA identification number to dispose of hazardous waste must report. If waste is disposed using the operator's EPA identification number then the GOCO facility is not required to report.

(4) Base Realignment and Closure (BRAC) activities are required to report generated hazardous waste. However, wastes generated from CERCLA cleanup or RCRA corrective actions should not be reported.

**2.1.2 Regional Reporting Requirements.** Regionalization is the term used to describe consolidation of several installation functions into a single regional command. This sometimes includes hazardous waste management. When reporting the HW P2ADS data each installation must submit a separate report. The regional hazardous waste manager may submit all reports for their region, but we need a separate HW P2ADS report for each installation in that region. Navy and Marine Corps installations that are not part of a region may continue to report as usual.

### **2.1.3 Generator Class Definitions.**

**Class I,** Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more hazardous waste, or 1 kg (2.2 pounds) or more acute hazardous waste. This is equal to 26,400 pounds or more hazardous waste, or 26.4 pounds or more acute hazardous waste, per year.

**Class II,** Small Quantity Generator, average monthly generation quantity of 100 to 1,000 kg (220–2,200 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to 2,640–26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

**Class III,** Conditionally Exempt Small Quantity Generator, average monthly generation quantity less than 100 kg (220 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

**2.2 HW P2ADS REPORT FORM.** The report form has three parts as listed below. An example completed report is shown in Section 2.3 and a blank HW P2ADS report form is provided at the end of this guide. A MS Word version of this form may be downloaded from our web site.

- PART A: CY04 HW P2ADS Activity Information
- PART B: CY04 HW P2ADS Operations Summary
- PART C: CY04 HW P2ADS Success Stories

### **2.2.1 PART A: CY04 HW P2ADS Activity Information.**

1. UIC. Enter the Unit Identification Code (UIC) of the installation or host activity submitting the report. Prefix the UIC with an “N” to indicate a Navy activity or an “M” to indicate a Marine Corps activity. If you don't know your UIC, you may look it up in Navy Comptroller Manual Volume 2, Chapter 5. BRAC installations should use the installation's original UIC. **NOTE:** We are aware that some activities have new UICs that are not available in the software. In that case, use your old UIC when entering your data into the database and provide your new UIC, activity name, and claimant in the comments field. We will update the database with the information you provide.

**MARCORPS NOTE:** The UIC is not the RUC contained in MCO P1080.20L, Chapter 1.

**NOTE: ACTIVITIES IN CARETAKER STATUS--**use the activity's original UIC, not

the UIC of your NAVFAC engineering field division or engineering field activity.

2. ACTIVITY NAME. Give the name of the reporting activity. Use the Plain Language Address –your naval message short title (e.g., NFESC Port Hueneme).
3. TENANT ACTIVITIES. List the name and UIC for all tenant activities that are included in this hazardous waste report. List only tenants that generate hazardous waste. Ship generated hazardous waste is considered generated by the receiving shore activity; therefore, do not list ships as tenants.
4. HW CONTACT. Give the name of the activity's hazardous waste contact. This should be the person who can answer questions regarding your hazardous waste report submittal.
5. DEPARTMENT CODE. Give the organizational code of the HW contact listed above.
6. PHONES AND FAX PHONE. Give the telephone number (as dialed from continental U.S.) of the contact and indicate if the number is DSN or commercial. Also, please give the fax number of the contact and indicate if the number is DSN or commercial. DSN is preferred. Include the DSN area code if outside CONUS.
7. E-MAIL ADDRESS. Give the e-mail address of the HW contact listed above.
8. GENERATOR CLASS. Provide the class that indicates the average monthly quantity of hazardous waste that the activity generates. To determine class include all hazardous wastes generated including those recycled. See class definitions below.

Class I, Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more hazardous waste or 1 kg (2.2 pounds) or more acute hazardous waste. This is equal to 26,400 pounds or more, or 26.4 pounds or more acute hazardous waste, per year.

Class II, Small Quantity Generator, average monthly generation quantity of 100–1,000 kg (220–2,200 pounds) hazardous waste and less than 1 kg (2.2 pounds) acute hazardous waste. This is equal to 2,640–26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

Class III, Conditionally Exempt Small Quantity Generator, average monthly generation quantity less than 100 kg hazardous waste and less than 1 kg acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

If your activity is a tenant Class III generator, your host command will report for you; however, you may be asked to provide information to your host. If your activity is a Class III generator and not a tenant, you are not required to report.

9. EPA IDENTIFICATION NUMBER(S). List your EPA identification number(s). All Class I and II generators are required to have an EPA identification number per 40 CFR 262.12 of the federal regulations. This is typically a 12 digit alpha-numeric number beginning with the two letter abbreviation of the state in which

your facility is located. This number is entered on HW manifests and is used to track and identify hazardous waste by generator. HW generated by tenant activities is usually disposed under the host installation's EPA identification number, thereby necessitating only one number for all HW generated within the host installation's fenceline.

If you list more than one EPA identification number, please explain the reason for multiple numbers in the Comments field by providing the name of the generator associated with each number and the reporting installation's relationship to each generator (e.g., an EPA identification number for a contractor who generates HW while performing work under contract with a SUPSHIP command.)

10. DO YOU HAVE A RCRA TSD OR INTERIM STATUS PERMIT? If you have one or more RCRA TSD permits or an interim status permit indicate "yes," or if none indicate "no."

Permit Number(s): List the RCRA TSD permit number(s) here. If you have an interim status permit then enter "interim status" as the permit number. RCRA permit numbers are issued by the Environmental Protection Agency or an authorized state agency to activities with treatment, storage, and disposal operations. Do not include 90-day storage or permit by rule.

11. DOES YOUR ACTIVITY HAVE A POLLUTION PREVENTION (P2) PLAN? Indicate "yes" or "no." Activities that are included in the P2 plan of a host or other activity should indicate "yes." If yes, provide the date that the plan was last updated. Note that this question applies to all activities whether industrial, light industrial, or administrative.

12. TOTAL HW MANAGEMENT COST. Provide the annual total hazardous waste costs for the calendar year. The costs should include but are not limited to:

- Costs paid to a contractor, Defense Reutilization Marketing Office, or treatment, storage, or disposal facility
- Storage costs charged to you while awaiting disposal
- Packaging, transport, and disposal costs
- Sampling and lab analysis costs
- Public works center handling fees, etc.

Costs should also include all management aspects associated with disposition of hazardous waste, excluding salaries. Include hazardous waste disposal costs for CERCLA or RCRA corrective actions only if funded using station operation and maintenance funds (i.e., O&MN or O&MNR funds). Do **NOT** include disposal costs associated with CERCLA cleanup or RCRA corrective action funded with Environmental Restoration, Navy (ERN) funds. Do not include costs to perform Defense Environmental Restoration Act (DERA) studies, such as site inspections or remedial investigations, etc.

The hazardous waste management costs reported here should be equal to or greater than the total costs reported in report form Part B, CY04 HW P2ADS Operations Summary. The HW management costs will include the total costs from Part B and all other costs related to hazardous waste management such as sampling and analyses costs that result in the waste going to a solid waste landfill rather than a hazardous waste landfill.

13. DOES YOUR INSTALLATION HAVE A CHRIMP PROGRAM, OR HCP FOR MARINE CORPS INSTALLATIONS, THAT INCLUDES ALL TENANTS, UNITS, AND CONTRACTORS, WITH A CENTRALIZED HAZARDOUS MATERIAL CONTROL POINT, CONTROLLING SOFTWARE, MINIMIZED INVENTORIES, AND HAZMAT CONTAINER TRACKING? CHRIMP is a methodology to achieve lifecycle hazardous material control and management (HMC&M) and pollution prevention at the command and facility levels. Check "yes" if installation HAZMAT users are on an installation-wide authorized use list and procure their HAZMAT through the HAZMIN center. Refer to the glossary definitions of CHRIMP and HCP.

14. COMMENTS. Use the comments field to provide additional information not covered by the report or to explain any unusual values or significant changes from your previous report. Indicate anomalies reported in your hazardous waste operations data, such as reporting a large increase in waste, beyond your normal operations. NOTE: If your report quantities, etc., are significantly different from last year and you don't provide an explanation one of our program coordinators will be calling you to obtain this information.

If your activity has a new UIC that is not available in the software, use your old UIC when entering your data into the database, and note your new UIC, activity name, and claimant in the comments field. We will update the database with the information you provide.

If you list more than one EPA identification number, please explain the multiple numbers in the comments field by providing the name of the generator associated with each number and the reporting installation's relationship to each generator.

**2.2.2 PART B: CY04 HW P2ADS Operations Summary.** The data reported here are wastes that are generated by Class I or Class II generators; waste off-loaded from a ship in port or at your activity; and waste from your tenants, including Class III tenants, if any. Wastes reported in this part are hazardous waste regulated under RCRA or state laws and regulations, or host nation Final Governing Standards.

Include hazardous material designated as hazardous waste after going through the reutilization, transfer, donation, and sales cycle. Include hazardous wastes sent to a public works center or DRMO for management and disposal.

**Do not** report oil, asbestos, asphalt, or PCB (Polychlorinated Biphenyl) wastes **unless** they are manifested as a hazardous waste under state laws or international agreements.

If you reported "Other Select Wastes" in the FY04 Solid Waste P2ADS that are manifested as

hazardous, you must also report those wastes here in the HW Operations Summary. The reason for the double reporting is that Other Select Wastes are not regulated as hazardous in all states. We need ALL manifested hazardous wastes to be reported in the HW P2ADS in accordance with the DOD HW MOM goal.

Activities that have radioactive hazardous waste (mixed waste) should provide the same range of data in the HW P2ADS report as they would provide to EPA or the state in a biennial report. Separate the radioactive mixed waste data from the hazardous waste data to distinguish the difference between the two waste types.

UIC and Generator Name. Specify the generator's UIC and name.

EPA or Navy Source Code. See Section 2.5 for a list of source codes and descriptions. The source codes are the same as those used in EPA's Hazardous Waste Report (Biennial Report), with the addition of two Navy-specific codes for purposes of HW P2ADS reporting. The Navy-specific codes are: S01-Ship Operations and M01-Munitions and Explosives.

For each source code, show the total pounds recycled, treated, or disposed, and the cost for each, on a separate line. For example, if some of the wastes for Source Code G16 were recycled and some of the wastes were treated, report them on two separate lines with the associated costs—do not combine the pounds of G16 all on one line. This will allow us to accurately report costs for waste recycled, treated, and disposed. See Part B, CY04 HW P2ADS Operations Summary, of the example completed form in Section 2.3.

**NOTE: USE POUNDS WHEN REPORTING QUANTITY.**

Quantities may be reported using the net weight or gross weight of the waste in pounds. Net weight is the weight of the waste without the container. The net weight is used when the container is returned for reuse rather than disposed of with the waste. Gross weight is the weight of the waste and the container when both are disposed.

Quantity Backlogged. Specify the number of pounds of hazardous waste generated and stored in the previous calendar year that was then disposed, treated, or recycled during the reporting calendar year. Backlogged quantities cannot be greater than Stored + Recycled + Treated + Disposed.

Quantity Stored. Specify the number of pounds of hazardous waste stored on site on 31 December 2004. Quantity stored includes hazardous wastes in temporary collection areas that are capped off as full. Note the following:

Report the actual status of the hazardous waste on 31 December 2004. Do not report the intermediate storage status of wastes treated or disposed before the end of the calendar year. For example, if a waste was stored on 31 March and shipped off site for disposal on 23 May, the HW P2ADS Operations Summary would show a quantity under disposal only, and the storage would not be reported.

Report wastes that are in storage on 31 December 2004 as “stored,” including those in less than 90-day accumulation areas. However, if a waste was manifested off site for disposal, but is still in storage at the off site facility, report that waste as disposed, not stored.

Quantity Recycled On site. Specify in pounds the quantity of hazardous waste recycled on site at the reporting activity. The quantity of reusable material should be listed here, while quantity of waste not reused (sludge), if known, should be listed as disposed.

Quantity Recycled Off site. Specify in pounds the quantity of hazardous waste recycled off site; for example, solvents sent off base through a contractor. The quantity of reusable material should be listed here, while the quantity of waste not reused (sludge), if known, should be listed as disposed.

Quantity Treated On site. Specify in pounds the quantity of hazardous waste treated on site during the calendar year. Treatment methods include neutralization, biological degradation, and thermal treatment such as incineration and open burning/open detonation of ordnance. Include only those hazardous wastes that have been treated to destruction. Do not include wastes that are treated to reduce the hazard and then disposed of as a hazardous waste. Wastes manifested off site must be reported as disposed. Wastewater that is piped from the generating source to an on site treatment plant is not reported.

Quantity Disposed On site. Specify in pounds the quantity of hazardous waste that was disposed of in a landfill located on the installation during the calendar year.

Quantity Disposed Off site. Specify in pounds the quantity of hazardous waste that was disposed of off site, to include treated off site, during the calendar year. Disposed is the amount of hazardous waste that was manifested off site for ultimate destruction or land disposal. Items contracted and shipped off site for disposal should be listed as disposed regardless of the actual status, e.g., in storage at contractor site or DRMO. Waste sent to DRMO should be reported as off site even if the DRMO is on Navy property. Wastes treated off site should be reported as disposed off site.

Total Cost. Indicate the total cost for disposal, treatment, or recycling for each source code and quantity listed on report form Part B, HW P2ADS Operations Summary. If costs are reported per pound please indicate that on the report. The overall total cost on the HW P2ADS Operations Summary should be equal to or less than the Total HW Management Costs reported in Part A, as the Part A total may include hazardous waste management costs not associated with the actual waste disposition such as contractor costs, analysis costs for wastes determined not to be hazardous, storage costs, etc.

**2.2.3 PART C: CY04 HW P2ADS Success Stories.** Provide a brief summary of your installation’s success stories.

Organization Name. Give the name of the activity.

Contact, Telephone Number, E-Mail Address. Give the name, telephone number, and e-mail address of activity contact. This should be the person who can answer questions regarding the success story.

Description of the Success. Give a description of the success in reducing or eliminating a hazardous waste.

Economic Benefits. Give a description of any economic benefits derived from eliminating or reducing a hazardous waste. Include the following aspects, as appropriate:

- Reduced disposal or treatment costs
- Reduced or eliminated hazardous material purchases
- Recycled materials replaced new purchases
- Dollars received by selling recyclables
- Labor savings
- Utilities savings

The following formula may be used to calculate return on investment (ROI) over a ten-year period:

$$\text{\$ ROI} = [(\text{Current} - \text{New})(10 \text{ yr})] - [\text{One Time Capital Costs}]$$

Current = Current annual operating costs, defined as cost to operate and maintain process before new technology or new management practice is initiated. Consider materials purchased, disposal and treatment costs, labor, and utilities.

New = Annual operating and maintenance costs of new technology or new management practice. Consider materials purchased, disposal and treatment costs, labor, and utilities. If you received money from recycling using the new technology or management practice then add this to the ROI.

One Time Capital Costs = Cost for new equipment plus installation costs; include any decommissioning or changeover costs as part of installation.

Include equipment depreciation and other cost factors, if significant, to present a return on investment that is more representative of your situation.

Pollution Prevention and Environmental Benefits. Give a description of pollution prevention or environmental benefits derived from reducing or eliminating a hazardous waste.

Consider the following in your narrative:

- Elimination of a hazardous waste stream
- Compliance issues:
  - Meeting compliance requirements through pollution prevention
  - Eliminating need for permits



- Meeting further reduction requirements or recycling goals, local or regional goals beyond the DOD Measures of Merit, such as diversion of waste from landfills
- Safety issues:
  - Have you reduced employee's exposure to toxic chemicals?
  - Have you eliminated the need for personal protection equipment?
- Time and effort saved

Other Benefits and Comments. Give any benefits other than those listed above and any other comments regarding the success of reducing or eliminating a hazardous waste at your activity.

**NOTE:** When in doubt as to whether or not you have a success story, just send us a narrative describing significant improvements to your hazardous waste program. **If you think it's a success story, we do too!**

## 2.3 EXAMPLE COMPLETED REPORT FORM

### PART A: CY04 HW P2ADS ACTIVITY INFORMATION 1 January-31 December 2004

1. UIC: N12345

2. INSTALLATION NAME: WPNSTA Boomtown, TX

3. LIST MAJOR TENANTS OR OTHER ACTIVITIES COVERED BY THIS REPORT:  
(Please attach continuation sheet if necessary.)

TENANT ACTIVITY NAMES	UIC
NAVHOSP BOOMTOWN	N67890
DENTAL CLINIC	N45678

4. HW CONTACT: JANE SMITH

5. DEPARTMENT CODE: 123

6. PHONE (DSN, COMMERCIAL): 555-5555, (888) 555-5555

FAX PHONE (DSN, COMMERCIAL): 555-5555, (888) 555-5555

7. E-MAIL ADDRESS: jane.smith@navy.mil

8. GENERATOR CLASS: I

9. EPA IDENTIFICATION NUMBER(S): TX2170032326

10. DO YOU HAVE A RCRA TSD OR INTERIM STATUS PERMIT?

YES X NO           

If yes, list the permit number(s): (1) 97-SC-055 (2) Interim Status

11. DO YOU HAVE A POLLUTION PREVENTION PLAN?

YES X NO           

If yes, provide the date your P2 plan was last updated: 1 December 2001

**PART A: CY04 HW P2ADS ACTIVITY INFORMATION (continued)**

**12. TOTAL HW MANAGEMENT COST:** \$154,000

**13. DOES YOUR INSTALLATION HAVE A CHRIMP PROGRAM, OR HCP FOR MARINE CORPS INSTALLATIONS, THAT INCLUDES ALL TENANTS, UNITS, AND CONTRACTORS, WITH A CENTRALIZED HAZARDOUS MATERIAL CONTROL POINT, CONTROLLING SOFTWARE, MINIMIZED INVENTORIES, AND CONTAINER TRACKING?**

(Check one) YES   X   NO           

**14. COMMENTS:** *WPNSTA Boomtown has two RCRA permits, one for a HW storage unit and one for an OB/OD treatment unit. The OB/OD unit will be operated under interim status until the State reviews our permit application and the latest round of operational data, and grants a final permit to operate.*

**PART B: CY04 HW P2ADS OPERATIONS SUMMARY**  
**1 January-31 December 2004**

**NAME AND UIC OF GENERATOR:**   N12345  WPNSTA Boomtown  

**Please read all instructions before reporting. Backlogged pounds cannot be greater than the sum of stored, recycled, treated, and disposed.**

**REPORT ALL QUANTITIES IN POUNDS.**

<u>SOURCE CODES</u>	<u>BACKLOG<sup>1</sup></u>	<u>STORED<sup>2</sup></u>	<u>RECYCLE ON SITE</u>	<u>RECYCLE OFF SITE</u>	<u>TREATED ON SITE</u>	<u>DISPOSED ON SITE</u>	<u>DISPOSED OFF SITE</u>	<u>TOTAL COST</u>
G15	0	0	0	0	0	0	200	100
G16	800	750	0	0	0	0	50	10
G16	0	0	0	850	0	0	0	50
G16	0	0	100	0	0	0	0	75

**Note:** In this example, 800 pounds were backlogged from CY03. Backlogged quantities cannot be greater than Stored + Recycled + Treated + Disposed. The G16 wastes are reported on separate lines so the costs can be associated with the disposition.

<sup>1</sup> Backlog pounds stored on 1 January 2004  
<sup>2</sup> Stored pounds as of 31 December 2004

**PART C: CY04 HW P2ADS SUCCESS STORIES**  
**1 January-31 December 2004**

**ORGANIZATION NAME:** *WPNSTA Boomtown, TX*

**CONTACT, TELEPHONE NUMBER, E-MAIL ADDRESS:** *Jane Jones, (888) 555-5555, jane.jones@navy.mil*

**DESCRIPTION OF THE SUCCESS:** *We reduced hazardous waste quantities and costs by using five distillation stills to recycle formalin, xylene, and ethyl alcohol.*

**ECONOMIC BENEFITS:** *Cost avoidance, or savings, of over \$15,000 per year on replacement chemicals.*

**POLLUTION PREVENTION AND ENVIRONMENTAL BENEFITS:** *By reducing our hazardous waste generation, we reduced potential personnel exposure to hazardous substances and reduced disposal costs. Additionally, we decreased our generation of alcohol from 4,610 lb/year to zero.*

**OTHER BENEFITS AND COMMENTS:** *None.*

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**Submit your report:**

E-mail to Estella Rosario at [estella.rosario@navy.mil](mailto:estella.rosario@navy.mil).

OR

Mail or fax your printed HW P2ADS report to:

COMMANDING OFFICER  
NAVAL FACILITIES ENGINEERING SERVICE CENTER  
ATTN: ESC 424/ESTELLA ROSARIO  
1100 23RD AVENUE  
PORT HUENEME CA 93043-4370

FAX: ESC424/Estella Rosario at DSN 551-4832 or (805) 982-4832. FAXED reports will be accepted as the official report. You are not required to also send a printed copy; however, please verify that your faxed report has been received by calling Estella Rosario at DSN 551-4807.

Marine Corps installations are required to submit a copy to CMC (LF).

## 2.4 GLOSSARY

**Acute HW.** Any hazardous waste with an EPA hazardous waste code beginning with the letter “P” or any of the following “F” codes: F020, F021, F022, F023, F026, and F027.

**Authorized Use List (AUL).** The list of all HM necessary to support the requirements of a command, facility, or activity.

**Biennial Report.** The Environmental Protection Agency (EPA) requires reports from certain generators of HW and operators of HW treatment, storage, and disposal units. Federal regulations require large quantity HW generators and operators of HW treatment storage and disposal units to submit this report once every two years; thus, it is called the Biennial Report. States may require the report annually and may also require small quantity HW generators to report.

**Backlogged.** Backlogged refers to a quantity of hazardous waste that was generated and reported as stored on 31 December of the previous calendar year, and is thus “backlogged” on January 1st of the reporting calendar year.

**Chem Demil Wastes Shipped Off site (M02) (applicable for new metric in CY05).**

Hazardous waste resulting from processing chemical agents, precursors, and binary chemical agents; destroyed containers and casings; dunnage; former production facilities; filters; and personal protective equipment. This includes only HW resulting from chemical demilitarization, and not other types of HW generated at the installation.

**CHRIMP (Consolidated Hazardous Material Reutilization and Inventory Management Program).**

CHRIMP is a methodology to achieve lifecycle hazardous material control and management and pollution prevention at the command and facility levels. The CHRIMP Manual, NAVSUP Publication 722, provides a standardized approach and guidance for development and implementation.

**Conventional and Chemical Munitions Treated On site (M04) (applicable for new metric in CY05).** Hazardous waste from any part of the lifecycle of munitions (conventional and chemical) treated on site in a RCRA permitted or interim status unit.

**Conventional Munitions Sent Offsite for Demilitarization (M03) (applicable for new metric in CY05).** Report only those conventional munitions, or components thereof, that are considered hazardous waste when sent off site for purposes of being disposed of, burned, or incinerated, etc.; that is, military munitions that are waste as defined by the Military Munitions Rule at 40 CFR 266 Subpart M. The term includes: confined gaseous, liquid, and solid propellants; explosives; pyrotechnics; riot control agents; smokes; and incendiaries used by DOD Components, including bulk explosives, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof. It does not include: wholly inert items; improvised explosive devices; or nuclear weapons, devices, and components thereof. Do not report unused munitions or

components sent offsite for purposes of being repaired, reused, recycled, reclaimed, disassembled, reconfigured, or otherwise subjected to materials recovery activities, as such munitions are not waste. Under the DDA process munitions reclassified from code “H” to code “V” are managed as HW.

**Disposed Off site.** Any hazardous waste that is manifested off site for ultimate destruction. This includes landfilling and thermal treatment.

**EPA and Navy Source Codes.** Source codes describe the type of process or activity from which a hazardous waste was generated. These are the same codes used in the EPA Biennial Report, with the addition of two source codes for Navy HW P2ADS reporting: S01–Ship Operations and M01–Munitions and Explosives. See Section 2.5 for a complete list and descriptions.

**EPA Identification Number.** Sometimes referred to as an EPA ID number, EPA generator number, or generator ID number. Per EPA regulation 40 CFR 262.12, EPA identification numbers, a generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the EPA Administrator. This is typically a 12 digit alpha-numeric number beginning with the two letter abbreviation of the state in which the facility is located. This number is entered on HW manifests and is used to track and identify hazardous waste by generator.

**Final Governing Standards (FGS).** FGS is the primary definitive set of criteria and standards applicable to DOD components located overseas at permanent base force structure installations and facilities. The FGS are developed by the DOD designated Executive Agent for the specific country and incorporate provisions of minimum standards established by DOD in the Overseas Environmental Baseline Guidance Document (OEBGD) and those of the host nation. FGS are a set of country-specific environmental standards developed via a comparative analysis of applicable host nation standards with those of the OEBGD. FGS incorporate the "more protective" standard and include appropriate hazardous waste definitions and criteria for all DOD components in a particular host country.

**Generator (Generated).** For reporting purposes, a generator is defined as an installation or activity that generates or produces hazardous waste in any amount. The term generator has been divided into three classes according to the quantity of HW generated as follows:

**Class I,** Large Quantity Generator, average monthly generation quantity of 1,000 kg (2,200 pounds) or more of hazardous waste, or 1 kg (2.2 pounds) or more acute hazardous waste, per month. This is equal to 26,400 pounds hazardous waste or more, or 26.4 pounds or more acute hazardous waste, per year.

**Class II,** Small Quantity Generator, average monthly generation quantity of 100-1,000 kg (220-2,200 pounds) of hazardous waste and less than 1 kg (2.2 pounds) of acute hazardous waste. This is equal to 2,640-26,400 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

**Class III, Conditionally Exempt Small Quantity Generator,** average monthly generation quantity less than 100 kg (220 pounds) of hazardous waste and less than 1 kg (2.2 pounds) of acute hazardous waste. This is equal to less than 2,640 pounds hazardous waste and less than 26.4 pounds acute hazardous waste per year.

If your activity is a tenant Class III generator, your host command will report for you. However, you may be requested to provide hazardous waste information to the host command. If your activity is a Class III generator, but not a tenant, you are not required to report.

**Hazardous Consolidation Program (HCP).** HCP is the Marine Corps program to achieve lifecycle hazardous materials control and management through the application of sound management practices that minimize the types and quantities of hazardous material procured, stored, distributed, and used to accomplish mission requirements at commands and installations.

**Hazardous Material (HM).** A substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce. Hazardous materials are listed in the Hazardous Material Regulations, 49 CFR 171, the Hazardous Material Table, 49 CFR 172.102, and are also listed in the DOT Emergency Response Guide, DOT P5800.

**Hazardous Waste (HW).** HW is waste listed by the EPA or an authorized state, or that meet characteristics specified by the EPA or an authorized state. A simplification of the federal EPA definition is as follows:

- A waste that is listed as hazardous in RCRA regulations, 40 CFR 261.
- A mixture that includes a listed hazardous waste.
- A waste that exhibits any of the following four characteristics: ignitability, corrosivity, reactivity, or toxicity as defined in RCRA regulations, 40 CFR 261.21-24.

**Hazardous Waste Generation Start Date.** As defined in 40 CFR 262.34, a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste at or near any point of generation without marking the container with an accumulation date. However, if you generate more than 55 gallons of hazardous waste or one quart of acute hazardous waste at or near any point of generation, then you must clearly mark the container holding the excess accumulation with the date the excess amount began accumulating. State regulations may vary.

**Hazardous Waste Pollution Prevention Annual Data Summary (HW P2ADS).** HW P2ADS is an annual summary report that includes information on hazardous waste generation and disposal. The report must be received at the NFESC no later than 16 March for the previous calendar year.

**Installation.** Installation, as used in this guide, is the host command for several Navy or Marine Corps activities, units, and commands. An installation may have several tenants. A fence normally surrounds the installation. Installations usually provide services to their tenants such as utilities, security, trash collection, and hazardous waste management and disposal under the



host's EPA identification number. Naval Base Ventura County is an installation with tenants such as the Naval Facilities Engineering Service Center, Naval Facilities Institute, etc. Tenants located on host installations of another military service should report through their own component headquarters reporting system. Overseas installations are defined as permanent, base force structure facilities, under the operational control of the secretary of a military department or the Department of Defense, located outside the United States, its territories, or any commonwealth or possession of the United States. Temporary, contingency operation or deployment support facilities located overseas are NOT considered installations for the purposes of HW P2ADS reporting. Tenants on overseas installations should report through their component headquarters reporting systems. NOTE: Beginning in CY05, Government-owned, Contractor-operated (GOCO) installations who meet the generation quantity thresholds for manifesting hazardous waste off site must report.

**Installation Restoration (IR) Program.** The IR Program is a comprehensive program to clean up past hazardous waste disposal or spill sites under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

**Interim Status.** Interim status is the temporary authorization to operate a hazardous waste treatment, storage, or disposal facility (TSDF) while the regulator processes your RCRA permit application. Interim status dates back to when the RCRA permit regulations were first issued. It was used as a means to temporarily allow existing TSDF facilities to continue hazardous waste operations until a final permit to operate could be granted by regulatory authorities. Typically, all Navy installations that require a RCRA permit have been granted a final permit by their regulatory authority, with the exception of a few open burn/open detonation (OB/OD) sites that are still operating under interim status per 40 CFR 265, having never received a final RCRA TSD permit to operate a 40 CFR 264 Subpart X, Miscellaneous Unit.

**Manifest.** A manifest is the shipping document required to accompany all HW shipments in accordance with 40 CFR 262 of the federal RCRA hazardous waste regulations. Many states use EPA Form 8700-22; however, state variations are not uncommon.

**Off site.** A process or treatment, storage, and disposal facility is considered off site if the operation is not on Navy property. Note that if the reported hazardous waste is disposed by another command, such as a public works center or DRMO, the disposal location is also considered to be off site. An example might be where an installation manifests hazardous waste to a public works center and the public works center, in turn, sends the waste to DRMO.

**On site.** A process or treatment, storage, or disposal facility is considered on site if the operation is on Navy property. This includes the reporting installation or any other contiguous Navy activity.

**Overseas.** Overseas is defined as outside any territory, possession or commonwealth of the United States. This does not include contingency operations, training deployments, or the operations of military vessels and aircraft.

**Polychlorinated Biphenyl (PCB).** A chemical substance, limited to the biphenyl molecule, that has been chlorinated to varying degrees, or any combination or mixture that contains such substance. PCBs are regulated under the Toxic Substances Control Act (TSCA) and EPA regulations for controlling PCBs, 40 CFR 750-761.

**PCB Wastes.** PCB wastes are derived from products containing PCBs. PCB wastes may be regulated under TSCA, RCRA, state programs, or for overseas installations, the applicable FGS.

**Quantity.** For purposes of this metric, quantity should be measured in pounds. Conversion factors should be consistent with EPA Biennial HW reporting requirements.

**RCRA (Resource Conservation and Recovery Act).** Public law mandates safe hazardous waste management from the point of generation to ultimate disposal. Federal regulations written by the Environmental Protection Agency to implement this act are in 40 CFR 260-272. Most states are authorized to administer a state HW program in lieu of the EPA's federal program.

**RCRA TSD Permits** are final or interim status operating permits for facilities that treat, store, or dispose of hazardous waste. The Environmental Protection Agency or authorized state agency issues permits. Do not include 90-day storage or "permit by rule" information.

**Recycling.** Recycling is a method used to render a hazardous material or hazardous waste reusable, such as distillation or reprocessing. Note that the difference between treatment and recycling is what results from each process –treatment facilitates disposal while recycling allows reuse (see treatment). Regardless, most hazardous materials are hazardous wastes when they are recycled, as specified in 40 CFR 261.2, Definition of Solid Waste. Recycling is a hazardous waste minimization method that may be performed on base, through DRMO, or through a contractor. A recycled waste does not necessarily have to be returned to the generating installation.

**Remediation Wastes Shipped Off site (report by EPA Source Code) (new CY05 metric).** Remediation wastes shipped off site are hazardous wastes resulting from CERCLA, RCRA, and state-driven cleanup activities that are also manifested off site as a RCRA or state-regulated HW. This includes the following EPA Source Codes as defined by EPA's 2001 Biennial Report guidance document: Closure of hazardous waste management unit under RCRA (G41); Corrective action at a solid waste management unit under RCRA (G42); Remedial action or emergency response under Superfund (G43); State program or voluntary cleanup (G44); Underground Storage Tank (UST) cleanup (G45); other remediation (G49). Wastes may be generated from compliance or Installation Restoration Program (IRP) funded clean-up activities. For overseas installations, Remediation Wastes are hazardous wastes as defined in the applicable FGS, generated as a result of cleanup conducted in accordance with DOD Instruction 4715.8, *Environmental Remediation for DOD Activities Overseas*.

**Storage (Stored).** Storage, as used in Part B of the P2ADS form, refers to hazardous wastes in storage awaiting treatment, recycling, or disposal as of 31 December of the reporting year. An installation may store generated hazardous waste for up to 90 days without a RCRA TSD permit.

**Tenant.** A tenant is an activity or unit with a separate UIC that occupies space within the geographical boundaries of another activity or installation that acts as host. Tenants usually receive services from the host activity. Examples are a shore intermediate maintenance activity at a naval station, a public works center at a naval station, or a naval aviation depot at a naval air station.

**Treatment (Treated).** Treatment is a method or process designed to neutralize or render hazardous waste non-hazardous. Report wastes that have been treated on site to destruction or to a non-hazardous state. Thermal treatment includes ordnance open burn/open detonation (OB/OD) and incineration. Remember that the difference between treating and recycling for the purposes of P2ADS reporting is what results from each process. Treatment facilitates disposal while recycling results in reuse--see recycling. Wastewater treated on site where the discharge is regulated under the Clean Water Act should not be reported.

**TSDF (Treatment, Storage, Disposal Facility).** A TSDF is a facility with a RCRA permit to treat, store, or dispose of hazardous waste, regulated under 40 CFR 264 of the federal regulations, or 40 CFR 265 for interim status.

**UIC (Unit Identification Code).** The UIC is a six character alphanumeric code with a prefix of "N" for Navy or "M" for Marine Corps that may be found in NAVCOMPT Manual Volume 2, Chapter 5. This is also known as a Department of Defense Activity Address Code (DODAAC) and is available from your financial manager or resource manager.

**Universal Waste (U01) (applicable for new metric in CY05).** Universal waste includes any of the following hazardous wastes that are managed under the universal waste requirements of 40 CFR 273:

- (1) Batteries as described in 40 CFR 273.2;
- (2) Pesticides as described in 40 CFR 273.3;
- (3) Thermostats as described in 40 CFR 273.4;
- (4) Lamps as described in 40 CFR 273.5; and
- (5) State-specified universal wastes.

## **2.5 EPA AND NAVY SOURCE CODES**

### **Wastes from Ongoing Production and Service Processes**

- G01 – Dip, flush, or spray rinsing
- G02 – Stripping and acid or caustic cleaning
- G03 – Plating and phosphating
- G04 – Etching
- G05 – Metal forming and treatment (pickling, heat treating, etc.)
- G06 – Painting and coating
- G07 – Product and by-product processing
- G08 – Removal of spent process liquids or catalysts
- G09 – Other production or service-related processes

### **Other Intermittent Events or Processes**

- G11 – Discarding off-specification or out-of-date chemicals or products
- G12 – Lagoon or sediment dragout and leachate collection
- G13 – Cleaning out process equipment
- G14 – Removal of tank sludge, sediments or slag
- G15 – Process equipment change-out or discontinuation of equipment use
- G16 – Oil changes and filter or battery replacement
- G19 – Other one-time or intermittent processes

### **Pollution Control and Waste Management Process Residuals**

- G21 – Air pollution control devices (baghouse dust, etc.)
- G22 – Laboratory analytical wastes (used chemicals)
- G23 – Wastewater treatment (sludge, filter cake, etc.)
- G24 – Solvent or product distillation or recovery (sludge, waste)
- G25 – Hazardous waste management
- G26 – Storage and disposal unit leachate collection

### **Spills and Accidental Releases**

- G31 – Accidental contamination of products, materials or containers
- G32 – Cleanup of spill residues
- G33 – Leak collection and floor sweeping
- G39 – Other cleanup of current contamination

### **Remediation of Past Contamination**

- G41 – Closure of hazardous waste management unit under RCRA
- G42 – Corrective action at a solid waste management unit under RCRA
- G43 – Remedial action or emergency response under Superfund
- G44 – State program or voluntary cleanup
- G45 – Underground storage tank cleanup
- G49 – Other remediation

### **Waste Not Physically Generated On Site**

- G61 – Hazardous waste received from off site for storage/bulking and transfer off site for treatment or disposal
- G62 – Hazardous waste received from a foreign country (other than a foreign Department of Defense site, Maquiladora, U.S. territory or protectorate). This site was the generator of record.

### **Navy Source Codes for P2ADS reporting**

- S01 – Ship Operations waste transferred from a ship to a shore installation. Hazardous waste generated during a ship's operations, e.g., water contaminated fuel; emptying bilge, tanks, voids, and other compartments; expired shelf-life materials; boiler layup and hydroblasting processes. Use this process for RCRA or state regulated wastes that must be manifested because of a ship decommissioning as well.
- M01 – Munitions and Explosives. Munitions that are a hazardous waste, as defined in 40 CFR 260.10 and 266; and, any hazardous waste related to the lifecycle of a munition that has an explosive component. Hazardous waste related to the lifecycle of a munition may be from manufacturing, demilitarization, or recovered from the munitions site-of-use, including any contaminated media from the recovery if it has an explosive component.

## **2.6 NEW NAVY SOURCE CODES FOR P2ADS REPORTING IN CY05**

- M01 – No longer used in CY05 due to potential discrepancies with the following new source codes for munitions: M02 –Chem Demil Wastes Shipped Off site, M03 –Conventional Munitions Sent Off site for Demilitarization, and M04 –Conventional and Chemical Munitions Treated On site.
- M02 – Chem Demil Wastes Shipped Off site (applicable for new metric in CY05). Hazardous waste resulting from processing chemical agents, precursors, and binary chemical agents; destroyed containers and casings; dunnage; former production facilities; filters; and personal protective equipment. This includes only HW resulting from chemical demilitarization, and not other types of HW generated at the installation.
- M03 – Conventional Munitions Sent Off site for Demilitarization (applicable for new metric in CY05). Report only those conventional munitions, or components thereof, that are considered hazardous waste when sent off site for purposes of being disposed of, burned, or incinerated, etc.; that is, conventional military munitions that are waste as defined by the Military Munitions Rule, 40 CFR 266 Subpart M. The term includes: confined gaseous, liquid, and solid propellants; explosives; pyrotechnics; riot control agents; smokes; and incendiaries used by DOD components, including bulk explosives, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof. It does not include: wholly inert items; improvised explosive devices; or nuclear weapons, devices, and components thereof. Do not report unused munitions or components sent offsite for

purposes of being repaired, reused, recycled, reclaimed, disassembled, reconfigured, or otherwise subjected to materials recovery activities, as such munitions are not waste. Under the DDA process munitions reclassified from code “H” to code “V” are managed as HW.

M04 – Conventional and Chemical Munitions Treated On site (applicable for new metric in CY05). Hazardous waste from any part of the lifecycle of munitions, conventional and chemical, treated on site in a RCRA permitted or interim status unit.

PW1 – PCB Wastes. PCB wastes are derived from products containing polychlorinated biphenyls. PCB wastes may be regulated under TSCA, RCRA, state programs, or for overseas installations, the applicable FGS.

S01 – Ship Operations waste transferred from a ship to a shore installation. Hazardous waste generated during a ship’s operations, e.g., water contaminated fuel; emptying bilge, tanks, voids, and other compartments; expired shelf-life materials; boiler layup and hydroblasting processes. Use this process for RCRA or state regulated wastes that must be manifested because of a ship decommissioning, as well.

U01 – Universal Waste (applicable for new metric in CY05). Any of the following hazardous wastes that are managed under the universal waste requirements of 40 CFR part 273: (1) Batteries as described in 40 CFR 273.2; (2) Pesticides as described in 40 CFR 273.3; (3) Thermostats as described in 40 CFR 273.4; (4) Lamps as described in 40 CFR 273.5; and (5) state-specified universal wastes.

**PART A: CY04 HW P2ADS ACTIVITY INFORMATION**  
**1 January-31 December 2004**

1. UIC: \_\_\_\_\_

2. INSTALLATION NAME: \_\_\_\_\_

3. LIST MAJOR TENANTS OR OTHER ACTIVITIES COVERED BY THIS REPORT:  
(Please attach continuation sheet if necessary.)

TENANT ACTIVITY NAMES	UIC

4. HW CONTACT: \_\_\_\_\_

5. DEPARTMENT CODE: \_\_\_\_\_

6. PHONE (DSN, COMMERCIAL): \_\_\_\_\_

FAX PHONE (DSN, COMMERCIAL): \_\_\_\_\_

7. E-MAIL ADDRESS: \_\_\_\_\_

8. GENERATOR CLASS: \_\_\_\_\_

9. EPA IDENTIFICATION NUMBER(S): \_\_\_\_\_

10. DO YOU HAVE A RCRA TSD OR INTERIM STATUS PERMIT(S)?

(Check one) Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, list the permit number(s): \_\_\_\_\_

11. DO YOU HAVE A POLLUTION PREVENTION (P2) PLAN?

(Check one) Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide the date your P2 Plan was last updated: \_\_\_\_\_

**PART A: CY04 HW P2ADS ACTIVITY INFORMATION (continued)**

**12. TOTAL HW MANAGEMENT COST: \$ \_\_\_\_\_**

**13. DOES YOUR INSTALLATION HAVE A CHRIMP PROGRAM, OR HCP FOR MARINE CORPS INSTALLATIONS, THAT INCLUDES ALL TENANTS, UNITS, AND CONTRACTORS, WITH A CENTRALIZED HAZARDOUS MATERIAL CONTROL POINT, CONTROLLING SOFTWARE, MINIMIZED INVENTORIES, AND HAZMAT CONTAINER TRACKING?**

(Check one)      Yes \_\_\_\_\_      No \_\_\_\_\_

**14. COMMENTS:**



**PART B: CY04 HW P2ADS OPERATIONS SUMMARY**  
**1 January-31 December 2004**

**NAME AND UIC OF GENERATOR:** \_\_\_\_\_

**Please read all instructions before reporting. Backlogged pounds cannot be greater than the sum of stored, recycled, treated, and disposed.**

**REPORT ALL QUANTITIES IN POUNDS.**

<u>SOURCE CODE</u>	<u>BACKLOG<sup>1</sup></u>	<u>STORED<sup>2</sup></u>	<u>RECYCLE ONSITE</u>	<u>RECYCLE OFFSITE</u>	<u>TREATED ONSITE</u>	<u>DISPOSED ONSITE</u>	<u>DISPOSED OFFSITE</u>	<u>TOTAL COST</u>
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<sup>1</sup> Backlog pounds stored on 1 January 2004  
<sup>2</sup> Stored pounds as of 31 December 2004

**PART C: CY04 HW P2ADS SUCCESS STORIES**  
**1 January-31 December 2004**

ORGANIZATION NAME:

CONTACT, TELEPHONE NUMBER, E-MAIL ADDRESS:

DESCRIPTION OF THE SUCCESS:

ECONOMIC BENEFITS:

POLLUTION PREVENTION AND ENVIRONMENTAL BENEFITS:

OTHER BENEFITS AND COMMENTS:

---

**Submit your report:**

E-mail to Estella Rosario at [estella.rosario@navy.mil](mailto:estella.rosario@navy.mil).

OR

Mail or fax your printed HW P2ADS report to:

COMMANDING OFFICER  
NAVAL FACILITIES ENGINEERING SERVICE CENTER  
ATTN: ESC 424/ESTELLA ROSARIO  
1100 23RD AVENUE  
PORT HUENEME CA 93043-4370

FAX: ESC424/Estella Rosario at DSN 551-4832 or (805) 982-4832. FAXED reports will be accepted as the official report. You are not required to also send a printed copy, however, please verify that your faxed report has been received by calling Estella Rosario at DSN 551-4807.

Marine Corps installations are required to submit a copy to CMC (LF).

**APPENDIX A**  
**P2ADS DISTRIBUTION LIST**

Distribution:

CG USMC BLOUNT ISLAND COMMAND (Code 920)  
CG MARCORCRUITDEP SAN DIEGO CA (ENV)  
CG MARCORCRUITDEP PARRIS ISLAND SC  
CG MCAGCC TWENTYNINE PALMS CA (Code 9)  
CG MCAS CHERRY PT NC (LN)  
CG MCB CAMP LEJEUNE NC (P2 Manager)  
CG MCB CAMP PENDLETON CA (Code 411)  
CG MCB CAMP SMEDLEY D. BUTLER JA (Code 35006ENV)  
CG MCCDC QUANTICO VA (B046)  
CG MCLB ALBANY GA (A490)  
CG MCLB BARSTOW CA (Code 411)  
COMFLEACT SASEBO JA (C68)  
COMFLEACT CHINHAE (N8E)  
COMFLEACT OKINAWA JA (Code 50E)  
COMFLEACT YOKOSUKA JA (Code 1092)  
COMNATNAVMEDCEN BETHESDA MD (Code 5400)  
COMNAVACT LONDON UK (A24)  
COMNAVAIRWPNSTA CHINA LAKE CA (Code 871000D)  
COMNAVDIST WASHINGTON DC (N21C, N21)  
COMNAVMARIANAS GUAM (N454)  
COMNAVMEDCEN PORTSMOUTH VA (Code 0731B)  
COMNAVMEDCEN SAN DIEGO CA (N45RHW)  
COMNAVSHIPYD NORFOLK VA (Code 106.321)  
COMNAVSHIPYD AND IMF PEARL HARBOR HI (Code 106.3)  
COMNAVSHIPYD PORTSMOUTH NH (Code 106.32)  
COMNAVSHIPYD PUGET SOUND WA (S/90HM)  
COMNAVSURFWARCEN CARDEROCKDIV BETHESDA MD (Code 354)  
COMNAVSURFWARCENDIV CRANE IN (Code 0951)  
COMNAVSURFWARCENDIV DAHLGREN VA (XDC8)  
COMNAVSURFWARCENDIV INDIAN HEAD MD (Code 044SY)  
COMNAVUSEAWARCENDIV KEYPORT WA (Code 8021)  
COMNTC GREAT LAKES IL (N451C)  
CO ADMIN SUPPU SWA BAHRAIN (N70)  
CO AFETA CAMP PEARY WILLIAMSBURG VA (Environmental Office)  
CO CBC GULFPORT MS (Code 410.3)  
CO FISC PEARL HARBOR HI (N465)  
CO FISC SAN DIEGO CA (Code N45RHW)  
CO HQBN HQMC HENDERSON HALL (FAC)  
CO MCAS BEAUFORT SC (NREAO)  
CO MCAS IWAKUNI JA (Code 7ENV)  
CO MCAS MIRAMAR CA  
CO MCAS NEW RIVER NC (SEA)

## **P2ADS DISTRIBUTION LIST**

Distribution: (Continued)

CO MCAS YUMA AZ (ENVL)  
CO MCB HAWAII (LEC)  
CO MCMWTC BRIDGEPORT CA (PWO-ENV)  
CO MCSUPACT KANSAS CITY MO (Safety)  
CO NAF ATSUGI JA (N51N)  
CO NAF EL CENTRO CA (N46ECW.K)  
CO NAF MISAWA JA (Code 110)  
CO NAS ATLANTA GA (Code 83)  
CO NAS BARBERS PT HI (Code N465)  
CO NAS BRUNSWICK ME (Code 191)  
CO NAS CORPUS CHRISTI TX (Code 186)  
CO NAS FALLON NV (N45F)  
CO NAS JACKSONVILLE FL (Code 184JB)  
CO NAS JRB FORT WORTH TX (N814)  
CO NAS JRB NEW ORLEANS LA (N12B)  
CO NAS JRB WILLOW GROVE PA (Code 992P)  
CO NAS KEFLAVIK IC (Code 6061)  
CO NAS KEY WEST FL (Code 1883)  
CO NAS KINGSVILLE TX (Code 00N00)  
CO NAS LEMOORE CA (N45LCW)  
CO NAS MERIDIAN MS (Code 18911)  
CO NAS NORTH ISLAND CA (Code N45JHW)  
CO NAS OCEANA VA (Code 940.2)  
CO NAS PATUXENT RIVER MD (Code 8.7.1.5)  
CO NAS PENSACOLA FL (Code 00600)  
CO NAS SIGONELLA IT (N49)  
CO NAS WHIDBEY ISLAND WA (N44)  
CO NAS WHITING FIELD MILTON FL (Code 18300)  
CO NAES LAKEHURST NJ (Code 8.7.4)  
CO NAVAVNDEPOT CHERRY POINT NC (LN)  
CO NAVAVNDEPOT NORTH ISLAND SAN DIEGO CA (Code 08213)  
CO NAVEODTECHDIV INDIAN HEAD MD (AC-4)  
CO NAVHOSP BEAUFORT SC (Code 01E)  
CO NAVHOSP BREMERTON WA (Code 014E)  
CO NAVHOSP GUAM (Code 305)  
CO NAVMAG INDIAN ISLAND WA (N42E)  
CO NAVMAG LUALUALEI HI (N465)  
CO NAVOCEANO STENNIS SPACE CENTER (N123)  
CO NAVPHIBASE LITTLE CREEK VA (Code 940.1)  
CO NAVREGCONTNEN SINGAPORE (N75)  
CO NAVSECGRUACT KUNIA HI (J41)  
CO NAVSECGRUACT SUGAR GROVE WV (N45)

## **P2ADS DISTRIBUTION LIST**

Distribution: (Continued)

CO NAVSTA NORFOLK VA (Code 940.1)  
CO NAVSHIPSYSENGSTA PHILADELPHIA PA (Code 357)  
CO NAVSTA EVERETT WA (N45A21)  
CO NAVSTA GUANTANAMO BAY CU (Code 2053)  
CO NAVSTA INGLESIDE TX (N761)  
CO NAVSTA MAYPORT FL (N4E1)  
CO NAVSTA NEWPORT RI (N8N)  
CO NAVSTA PASCAGOULA MS (N751)  
CO NAVSTA PEARL HARBOR HI (N465)  
CO NAVSTA ROOSEVELT ROADS PR (N46E1)  
CO NAVSTA ROTA SP (N7N2)  
CO NAVSTA SAN DIEGO CA (N45JHW)  
CO NAVSUPPACT LA MADDALENA IT (Code 007)  
CO NAVSUPPACT MIDSOUTH MEMPHIS TN (Code 0101)  
CO NAVSUPPACT NAPLES IT (PW ENV)  
CO NAVSUPPACT NEW ORLEANS LA (N12B)  
CO NAVSUPPACT PHILADELPHIA PA (ENV DEPT)  
CO NAVSUPPFAC DIEGO GARCIA (N5E)  
CO NAVSUPPSTA MECHANICSBURG PA (Code 09M22)  
CO NAVSURFWARCEN COASTSYSTA DAHLGREN DIV PANAMA CITY FL (XPW5)  
CO NAVUNSEAWARCEN DIV NEWPORT RI (Code 551)  
CO NBVC PORT HUENEME CA (N45V)  
CO NBVC POINT MUGU CA (N45V)  
CO NETPMSA SAUFLEY FIELD FL (Code 00600)  
CO NCTAMS LANT DET CUTLER ME (NOOR4E)  
CO NCTAMS EASTPAC WAHIAWA HI (N465)  
CO NOCPACDIV DET FALLBROOK CA (N45S)  
CO NRL WASHINGTON DC (Code 3546)  
CO NTTC CORRY STATION PENSACOLA FL (Code 22000)  
CO OLF SAN DIEGO SAN NICOLAS ISLAND CA (Code 870000E)  
CO PACMISRANFAC HAWAREA BARKING SANDS HI (Code 7031.5B)  
CO PWC GUAM (Code 910)  
CO PWC PEARL HARBOR HI (N465)  
CO PWC SAN DIEGO CA (N45JHW)  
CO SPAWARSCEN SAN DIEGO CA (N45JHW)  
CO SUBASE BANGOR WA (N45A11)  
CO SUBASE KINGS BAY GA (PW-4)  
CO SUBASE NEW LONDON CT (N8S51)  
CO SUBASE SAN DIEGO CA (N45JHW)  
CO SURFCOMBATSYSCEN WALLOPS ISLAND (M221)  
CO WPNSTA CHARLESTON SC (CW340)  
CO WPNSTA CONCORD CA (N45SC)  
CO WPNSTA EARLE COLTS NECK NJ (N8E)

## **P2ADS DISTRIBUTION LIST**

Distribution: (Continued)

CO WPNSTA SEAL BEACH CA (N45S)  
CO WPNSTA DET PORT HADLOCK WA (Code N42E)  
CO WPNSTA YORKTOWN VA (Code 940.2)  
DIR NAVSEA DET NISMF PEARL HARBOR HI (N32)  
DIR NSWC P H DET LOUISVILLE (Code 06/CSO)  
OIC NAVSURFWARREN DET BAYVIEW ID (Code 3504)  
OIC NAVUNSEAWARCENTET AUTEC ANDROS ISLAND BAHAMAS (Code 7007)  
SUP NAVPGSCOL MONTEREY CA (Code 2314)  
SUP USNA ANNAPOLIS MD (PWD 170)  
SUPSHIP JACKSONVILLE FL (Code 140)  
SUPSHIP BATH ME (Code 140)  
SUPSHIP NEWPORT NEWS VA (Code 140)

Copy to:

CMC (LFF-1, LF)  
CNO (FSA, N451, N452)  
COMLANTFLT (N46, N465, N4653B)  
CNI (N45)  
COMPACFLT (N46522)  
COMNVRESFOR  
COMNAVSURFRESFORWEST (N2E)  
COMNAVSEASYS COM (SEA-00T)  
COMNAV AIRSYS COM (AIR-8.3)  
COMNAV FACENG COM (ENVTC/ENQ-MR)  
COMNAV FAC EFD ATLANTIC NORFOLK VA (V13, ARE1CC)  
COMPACNAV FACENG COM (ENV18, ENV1812/CO)  
COMNAV REG MIDLANT NORFOLK VA (REC)  
COMNAV REG SOUTHEAST JACKSONVILLE FL  
COMNAV REG MIDWEST GREAT LAKES IL (REC)  
COMNAV REG SOUTHWEST SAN DIEGO CA (REC)  
COMNAV REG NORTHEAST GROTON CT (REC)  
COMNAV REG NORTHWEST SEATTLE WA (REC)  
COMNAV REG HAWAII (REC)  
COMNAV REG SOUTH TX (REC)  
COMNAV REG GULF COAST (REC)  
COMNAV MARIANAS GUAM (REC)  
COMNAV FOR JAPAN (REC)  
COMNAV FOR KOREA (REC)  
COMFAIR KEFLAVIC (REC)  
CO NAVENVIRHLTHCEN NORVA (EPWR) (BUMED copy)  
CO SOUTHNAV FACENG COM (ES23)  
CO SOUTHWESTNAV FACENG COM (Code 572)  
CO ENGFLDACT CHES (Code 02)

## **P2ADS DISTRIBUTION LIST**

Copy to: (Continued)

CO ENGFLDACT MED (EV)

CO ENGFLDACT WEST DALY CITY CA (Code 052)

CO ENGFLDACT MIDWEST GREAT LAKES IL (Code 914)

CO ENGFLDACT NORTHEAST PHILADELPHIA PA (EV12)

CO ENGFLDACT NORTHWEST SILVERDALE WA (Code 05E)

CO ENGFLDACT SOUTHEAST (Code 054LB)